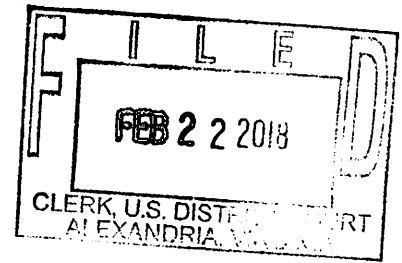


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA)

v.)

JON WILKINS)

Defendant.)

CASE NO. 1:18-mj-89

UNDER SEAL

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Peter Kaupp, being first duly sworn, hereby depose and state as follows:

INTRODUCTION & BACKGROUND

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such. I have been so employed by the FBI since March of 2005. Currently, I am assigned to the Northern Virginia Resident Agency of the Washington Field Office, where my duties include investigations pertaining to the sexual exploitation of children and on-line offenses involving children, including the production, transportation, distribution, receipt and possession of child pornography. I have been with WFO since 2012 and assigned to the Child Exploitation Task Force since May of 2015. I have made numerous arrests and interviewed numerous victims, witnesses, and suspects. I have participated in numerous child abuse investigations, child sex abuse investigations, and Internet Crimes Against Children investigations. I have also received extensive training in online child exploitation investigations and undercover online investigations.

2. Along with other agents and investigators of the FBI, I am currently involved in an investigation of child pornography offenses committed by JON WILKINS (hereinafter referred to as "WILKINS"). Based on the investigation conducted to-date, there is probable cause to believe that WILKINS received child pornography in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1). I submit this Affidavit in support of a criminal complaint.

3. As part of the investigation, I have reviewed documentation and reports provided by and discussed information with other agents and investigators involved in the investigation. For purposes of this Affidavit, I have not distinguished between information of which I have direct knowledge and that of which I have hearsay knowledge.

4. This Affidavit does not contain every fact known to the investigation, but only those deemed necessary to demonstrate sufficient probable cause that WILKINS committed the offenses alleged in this complaint.

RELEVANT STATUTES

5. This investigation concerns alleged violations of: 18 U.S.C. 2252(a)(2) and (b)(1), Receipt of Child Pornography.

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

6. In 2015, FBI agents investigated a website that will be referred to for purposes of this Affidavit as Playpen. "Playpen" was a bulletin board and website dedicated to the advertisement and distribution of child pornography and the discussion of matters pertinent to the sexual abuse of children, including the safety and security of individuals who sexually exploit children online. Users of this website were required to utilize a user name and password to access

the site. Among numerous other users, one of the individuals who accessed the site had a user name of “cowboy357m” and a logon name “Sugar Daddy” and a host name of “SugarDome”¹. This member originally registered for an account on “Playpen” on March 4, 2017 and remained logged into the website for approximately 51 minutes and 47 seconds on March 4, 2017.

7. The investigation identified that the “cowboy357m” user accessed a portion of Playpen containing child pornography using an Internet Protocol (IP) address of 173.73.220.200, from a computer bearing the MAC address “C417FE240087”. Specifically, on March 5, 2015, the user “cowboy357m” with IP address 173.73.220.200 accessed a post in the pre-teen hardcore section of the site entitled “Beautiful blonde gets fucked and poses”. The post included 23 photos of a prepubescent blonde girl, including multiple photos of her being vaginally penetrated by the penis and finger of what appears to be an adult male.

8. During the same session, the user “cowboy357m” also browsed a post entitled “Becca 14.” Among other things, this post was described as containing “some pictures I’ve been given by some girls I’ve been talking to lately, some really naughty girls:D Gonna start with posting pictures of Becca, she’s 14.” The post contained multiple photos of a prepubescent girl, including photos of her spreading her genitals with her fingers.

9. Using publicly available websites, FBI agents were able to determine that the above noted IP address (173.73.220.200) was operated by the Internet Service Provider (“ISP”) Verizon. On March 17, 2015, an administrative subpoena was served on Verizon requesting information

¹ User name is associated with the Playpen website; Logon name is associated with his Windows username; and Host name is a name created by the user of the computer.

related to the user of this IP address on the date and approximate time it was used to access "Playpen". According to information received from Verizon on March 19, 2015, in response to the March 17, 2015 subpoena, the IP address was subscribed to WILKINS, at 2100 Brandywine Street, Arlington, Virginia 22207.

10. On or about July 27, 2015, a search of CLEAR (a public records database that provides names, dates of birth, addresses, associates, telephone numbers, email addresses, ect.) was conducted for 2100 Brandywine Street, Arlington, Virginia 22207. These public records indicated that Jon Wilkins' resided at 2100 Brandywine Street, Arlington, Virginia 22207.

11. On or about July 16, 2015, a search of the Virginia Department of Motor Vehicles (DMV) database was conducted using queries for Jon Wilkins. This search listed 2100 Brandywine Street, Arlington, Virginia 22207, as Jon Wilkins' residence.

EXECUTION OF A SEARCH WARRANT

12. On August 4, 2015, agents and officers of the FBI searched WILKINS' residence pursuant to a search warrant authorized by the United States District Court for the Eastern District of Virginia. WILKINS and his wife were present when agents and officers arrived to conduct the search. Among other items, the following were located and seized from the residence:

White HP Pavillion laptop computer:

13. The White HP Pavillion laptop computer was forensically reviewed and revealed MAC address "C417FE240087", registered owner "Sugar Daddy", display computer name "SugarDome", and computer name "SUGARDOME". This computer contained three user accounts, "Administer", "Guest", and "SugarDaddy". The Administer and Guest accounts are

default accounts set up by the operating system at the time of initial installation. The SugarDaddy account revealed the last login date was June 20, 2015, with a total login count of 1,862, with zero invalid logons recorded.

14. The Onion Router, commonly known as TOR, is a browser that can be used to access webpages on the dark web, where Playpen is hosted. The TOR browser was used on this White HP Pavillion laptop computer on or about June 18 to June 20, 2015. According to recent documents on this device, a number of files were viewed on the system that contained filenames suggestive of child pornography², such as:

- a. Pthc 2009 Cachando (Veci The New Linda).avi.lnk
- b. Pthc 2009 Veci (10yo Cum In Mouth, Good).mpg.lnk
- c. 12yo horny on omegle.avi
- d. 9yo_2013_.mp4
- e. 13yo fuk (vdubbed).flv

22. LNK files are files that have been opened by the user of a computer device. Several LNK files contain names suggestive of child pornography. Artifacts in the jumplists and shellbags contained filenames suggestive of child pornography, references to the use of the TOR browser, and references to the G: drive previously described. The following folders were also referenced and contain child pornography:

- a. C:/Users/Public/Documents/TBD/New Folder/Self Shot/
- b. C:/Users/Public/Documents/TBD/New Folder/Cum/
- c. C:/Users/Public/Documents/TBD/New Folder/Topless/

² “Pthc” is an acronym commonly used among individuals sharing child pornography. It stands for “pre-teen hard core.” “Yo” is commonly used to identify how many years of age a child is in a child pornography image or video.

23. Mozilla Firefox private browsing artifacts are consistent with the use of TOR browser. Many of these artifacts referenced onion, boys and girls.

- a. <http://yn5u473m54dbptve.onion:9001/boys.png>
- b. <http://yn5u473m54dbptve.onion:9001/girls.png>
- c. <https://atlas.torproject.org/img/loader.gif>
- d. <http://yn5u473m54dbptve.onion:9001/hn.png>
- e. <https://atlas.torproject.org/css/style.css>

24. A total of 987 images of possible child pornography were discovered on the White HP Pavillion laptop computer. The "Sugar Daddy" profile contained other files and photos belonging to Jon Wilkins. The Pagefile.sys contained a number of references to "Jon Wilkins", such as:

- a. /Sugar Daddy/Desktop/Jon Wilkins Resume.pdf Summer 2010
- b. \DADDYDESKTOP\JON WILKINS RESUME.PDF
- c. TaxReturn.lnk Jon Wilkins Resume full.pdf
- d. Jon Wilkins Resume full.lnk
- e. C:\Users\Sugar Daddy\Desktop\Jon Wilkins Resume.pdf
- f. I\USERS\SUGAR DADDYDESKTOP\JON WILKINS RESUME.PDF
- g. TaxReturn.pdf
- h. TaxReturn.lnk
- i. Jon Wilkins Resume full.pdf
- j. Jon Wilkins Resume full.lnk
- k. stmt-390057.lnk
- l. stmt-390057.lnk

26. Located within the
\Software\Microsoft\Windows\CurrentVersion\Explorer\RecentDocs\pdf key was:

- a. Shortcut Target Name: Jon Wilkins Resume full.pdf
- b. Shortcut Name (ASCII): Jon Wilkins Resume full.lnk

27. Located within C:/Users/Sugar Daddy/AppData/Roaming/Skype/thejbj/main.db were chat remnants between Skype user "Jon Wilkins" and "Simone Borisov". One of the remnants stated "Hi simoneborisov! I'd like to add you on Skype. Jon Wilkinssimoneborisov".

28. There were a number of sexually-explicit images and videos in C:/Users/Public/Documents/TBD/New Folder/Mine/Simone/ that depicted a male who closely resembles Jon Wilkins with an unknown individual.

Black CPU

29. The black CPU contained four hard drives. The operating system for the black CPU was Windows 7 Professional, version 6.1, installed on November 27, 2012. The following information was observed for the this account:

- a. Registered Owner: James Bond
- b. Computer Name: MAGICBOX
- c. User name: James Bond
- d. Password protected: No
- e. Last login date: August 3, 2015
- f. Logon Count: 647
- g. Last Shutdown Date: August 3, 2015
- h. Invalid Logon Count: 0

30. 94 images of potential child pornography were identified on this computer. Several of these images depict young, prepubescent girls providing oral sex on adult males. These images were found in the thumbcache of the James Bond user profile.

31. A hard drive in this computer referred to as QWF5_3 contained a digital video of potential child pornography. This file was named "c:/Software Backup/Firefox/my little girl 2 - MOTHERLESS.COM.flv", dated December 5, 2013.

32. A number of photographs of Jon Wilkins, dated between March 2015 and July 2015 were discovered on this computer.

33. TOR browser was installed in July of 2015. There was also a reference to the uTorrent program in the recent documents. TOR browser was installed on this device at \Users\James Bond\Desktop\TOR Browser. TOR Browser was being used on this device on or about August 3, 2015.

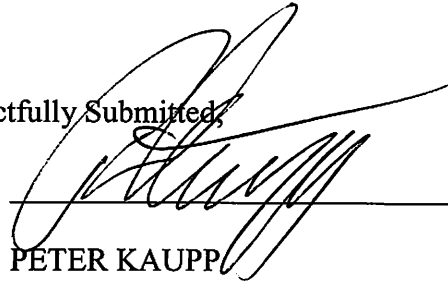
WILKINS Interview

34. While agents and officers were searching the residence, WILKINS was interviewed and advised that he has resided at 2100 North Brandywine Street, Arlington, Virginia, since March of 2012. WILKINS advised that he is the sole user of the desktop computer (black CPU) located in the basement of the residence and does not recall his wife, or anyone else ever using or accessing it. WILKINS also owns and is the sole user of a laptop computer (white HP Pavillion). Over the years, WILKINS and his wife have had visitors but none of these visitors have had access to any of the computers at WILKINS' residence. WILKINS advised that he downloaded the Tor Network approximately six (6) months ago for the purpose of getting discounted travel rates on the Tor Network.

CONCLUSION


35. Based on the foregoing, your affiant believes that there is probable cause to believe that within the Eastern District of Virginia, JON WILKINS committed the offenses of Title 18 U.S.C. §2252(a)(2) and (b)(1), Receipt of Child Pornography.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'P. Kaupp', is written over a horizontal line.

PETER KAUPP
SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Subscribed to and sworn before me
This 22nd day of February 2018.

_____/s/ 
Michael S. Nachmanoff

United States Magistrate Judge
HONORABLE MICHAEL S. NACHMANOFF
UNITED STATES MAGISTRATE JUDGE